

IN THE UNITED STATES COURT OF FEDERAL CLAIMS

STEPHANIE MERCIER,
AUDRICIA BROOKS,
DEBORAH PLAGEMAN,
JENNIFER ALLRED,
MICHELLE GAVIN,
STEPHEN DOYLE, on behalf of themselves
and all others similarly situated,

Plaintiffs,

v.

No. 12-920C

(Judge Kaplan)

THE UNITED STATES OF AMERICA,

Defendant.

PLAINTIFFS' UNOPPOSED REQUEST FOR STATUS CONFERENCE

Plaintiffs hereby request a status conference with the Court to be held as expeditiously as possible to discuss the process of approval of the Parties' settlement in principle. The Government does not oppose the request for a status conference.

After eight years of hard-fought litigation, Plaintiffs and the Government on January 4, 2021 reached a settlement in principle of the overtime claims asserted in this case. As requested, Plaintiffs provided the Government with a comprehensive settlement allocation spreadsheet for all Class Members and on or about March 18th, Counsel finalized the language of the Settlement Agreement which we understand is still awaiting approval at "Main Justice." As noted in the

Updated Status Report (Dkt No. 237) the Associate Attorney General, the “final decision maker,” received the settlement recommendation memo on June 15, 2021.

Despite Defendant Lead Counsel’s good faith efforts, it is Plaintiffs’ perception that the settlement approval process has been unnecessarily protracted. It simply should not take three and one-half months to review and consider a settlement recommendation. Plaintiffs have prepared and are ready to file the preliminary approval motion, the supporting memorandum and the proposed notices of class action settlement but cannot do so until we secure full DOJ approval authorizing Mr. Oliver to execute the Settlement Agreement on behalf of the Government.

Accordingly, Plaintiffs respectfully request a conference with the Court to explore any measures that may be employed to facilitate DOJ approval of the Settlement Agreement so that we can move toward a final resolution of this case for Class Members.

Respectfully Submitted,

/s/ Michael Hamilton_____

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I hereby certify that on July 1, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to counsel for all parties.

/s/ Michael Hamilton